



PERMIT NO. ALS000032

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# Pollution Prevention/Good Housekeeping

*Permit Part II B.7.*



# POLLUTION PREVENTION/GOOD HOUSEKEEPING

## PERMIT PART II B.7.

The primary purpose of this program is to examine and subsequently alter City actions to help ensure a reduction in the amount and type of pollution that: (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and can be discharged into local waterways; and (2) results from action such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer system.

### INVENTORY OF MUNICIPAL FACILITIES

FACILITY	WATERSHED	TYPE FACILITY
<b>PART A PREMISES</b>		
ARLINGTON ANTEBELLUM MUSEUM	Valley Creek	Museum
AVONDALE LIBRARY	Village Creek	Library
AVONDALE VILLA	Village Creek	
BFS #1	Valley Creek	Fire Station
BFS #11	Valley Creek	Fire Station
BFS #12	Valley Creek	Fire Station
BFS #13	Village Creek	Fire Station
BFS #16	Village Creek	Fire Station
BFS #17	Village Creek	Fire Station
BFS #18	Village Creek	Fire Station
BFS #21	Valley Creek	Fire Station
BFS #25	Valley Creek	Fire Station
BFS #27	Village Creek	Fire Station
BFS #29	Five Mile Creek	Fire Station
BFS #30	Five Mile Creek	Fire Station
BFS #31	Cahaba River	Fire Station
BFS #32	Shades Creek	Fire Station
BFS #7	Valley Creek	Fire Station
BFS #9	Valley Creek	Fire Station
BILL HARRIS ARENA	Valley Creek	
BIRMINGHAM CROSSPLEX	Valley Creek	Arena
BOTANICAL GARDENS GREENHOUSE	Shades Creek	
BOTANICAL GARDENS	Shades Creek	
BOUTWELL AUDITORIUM	Valley Creek	Arena

CENTRAL LIBRARY & LINN-HENLEY LIBRARY	Valley Creek	Library
CENTRAL PARK AND RECREATION CENTER	Valley Creek	Park and Rec
CITY HALL	Valley Creek	
CIVIL RIGHTS INSTITUTE	Valley Creek	Museum
EAST LAKE LIBRARY	Village Creek	Library
EAST PINSON VALLEY RECREATION CENTER	Turkey Creek	Rec Center
FIVE POINTS WEST LIBRARY	Valley Creek	Library
HAWKINS GOLF PUMPING STATION	Village Creek	
HIGHLAND PARK PRO SHOP	Village Creek	
HOOVER CITY PARK AND RECREATION CENTER	Village Creek	Park and Rec Center
INGLENOOK PARK AND RECREATION CENTER	Village Creek	Park and Rec Center
LEGION FIELD	Valley Creek	
M L KING PARK AND RECREATION CENTER	Village Creek	Park and Rec Center
M L KING POOL	Village Creek	Pool
MCALPINE PARK, RECREATION CENTER, AND POOL	Village Creek	Park, Rec Center, & Pool
MUNICIPAL SERVICES BLDG	Valley Creek	
NORTH BIRMINGHAM LIBRARY	Village Creek	Library
ROOSEVELT CITY PARK, RECREATION CENTER, AND POOL	Valley Creek	Park, Rec Center, & Pool
SOUTHERN MUSEUM OF FLIGHT	Village Creek	Museum
SOUTHSIDE LIBRARY	Valley Creek	Library
SPRINGVILLE ROAD LIBRARY	Five Mile Creek	Library
TACTICAL POLICE BLDG	Valley Creek	
TRAFFIC ENGINEERING SOUTHSIDE	Valley Creek	
WEST END LIBRARY	Valley Creek	Library
WIGGINS PARK AND RECREATION CENTER, POOL, LIBRARY	Valley Creek	Park, Rec Center, & Library
WILLOW WOOD PARK AND RECREATION CENTER	Village Creek	Park and Rec Center
WOODLAWN LIBRARY	Village Creek	Library

WOODWARD POOL AND CAMP FIRE BUILDING	Valley Creek	
<b>PART B PREMISES</b>		
ART MUSEUM	Valley Creek	Museum
BFS #10/#22	Village Creek	Fire Station
BFS #15	Valley Creek	Fire Station
BFS #19	Village Creek	Fire Station
BFS #2	Valley Creek	Fire Station
BFS #23	Five Mile Creek	Fire Station
BFS #26	Shades Creek	Fire Station
BFS #28	Five Mile Creek	Fire Station
BFS #3	Shades Creek	Fire Station
BFS #6	Valley Creek	Fire Station
BFS #8	Village Creek	Fire Station
BIRMINGHAM HEALTH & FITNESS CENTER (FIRE DEPT)	Valley Creek	Fitness Center
BPD ADMIN, ACADEMY, AND JAIL	Valley Creek	
BPD EAST PRECINCT	Village Creek	Police Station
BPD HQ BLDG	Valley Creek	Police Station
BPD NORTH PRECINCT	Village Creek	Police Station
BPD SOUTH PRECINCT	Valley Creek	Police Station
BPD STABLES	Valley Creek	
BPD STORAGE (CITY STORES)	Valley Creek	
BPD WEST	Village Creek	Police Station
BRUNO BLDG	Valley Creek	
BUTLER BLDG	Valley Creek	
COMER BLDG	Valley Creek	
COMMUNITY CENTER	Five Mile Creek	
BROWNSVILLE HEIGHTS		
CRESTWOOD PARK POOL	Village Creek	
DEM - BPD SATELLITE	Valley Creek	
DEPARTMENT OF EQUIPMENT	Valley Creek	
MANAGEMENT & GARAGE		
DIV OF YOUTH SERVICE (OLD AL POWER CREDIT UNION)	Valley Creek	
DPW ADMIN/SOUTHSIDE DISTRICT OFFICE	Valley Creek	
DPW CONSTRUCTION DIVISION	Valley Creek	
DPW EASTERN AREA LANDFILL ADMIN BLDG & SCALEHOUSE	Cahaba River	



DPW EASTERN DISTRICT OFFICE	<i>Village Creek</i>	
DPW ENSLEY DISTRICT OFFICE	<i>Village Creek</i>	
DPW NEW GEORGIA LANDFILL ADMIN BLDG	<i>Five Mile Creek</i>	
DPW NORTH BHM DISTRICT OFFICE	<i>Village Creek</i>	
EAST ENSLEY LIBRARY	<i>Village Creek</i>	<i>Library</i>
EAST LAKE POOL	<i>Village Creek</i>	<i>Pool</i>
EAST THOMAS POOL	<i>Village Creek</i>	<i>Pool</i>
ENSLEY LIBRARY	<i>Valley Creek</i>	<i>Library</i>
ENSLEY PARK AND RECREATION CENTER	<i>Valley Creek</i>	<i>Park and Rec</i>
FOUNTAIN HEIGHTS PARK & REC/E.O.JACKSON POOL	<i>Village Creek</i>	<i>Park, Rec Center, &amp; Pool</i>
GRAYSON PARK POOL	<i>Five Mile Creek</i>	<i>Pool</i>
HARRIS POOL	<i>Valley Creek</i>	<i>Pool</i>
HARRISON PARK AND RECREATION CENTER	<i>Valley Creek</i>	<i>Park and Rec Center</i>
HAWKINS PARK AND RECREATION CENTER	<i>Village Creek</i>	<i>Park and Rec Center</i>
HENRY CRUMPTON/COOPER GREEN PARK AND RECREATION CENTER	<i>Valley Creek</i>	<i>Park and Rec Center</i>
HORTICULTURE ADMIN BLDG	<i>Valley Creek</i>	
HOWZE SANFORD PARK AND RECREATION CENTER	<i>Village Creek</i>	<i>Park and Rec Center</i>
IMS	<i>Village Creek</i>	
INGLENOOK LIBRARY	<i>Five Mile Creek</i>	<i>Library</i>
INTERMODAL	<i>Valley Creek</i>	<i>Bus Station</i>
JAZZ HALL OF FAME	<i>Valley Creek</i>	
JIMMIE HUDSON/SANDUSKY PARK AND RECREATION CENTER	<i>Village Creek</i>	<i>Park and Rec Center</i>
LEWIS PARK POOL	<i>Village Creek</i>	<i>Pool</i>
MEMORIAL PARK AND RECREATION CENTER	<i>Valley Creek</i>	<i>Park and Pool</i>
MEMORIAL POOL	<i>Valley Creek</i>	<i>Pool</i>
MUNICIPAL JUSTICE CENTER	<i>Valley Creek</i>	
NEGRO LEAGUE BASEBALL MUSEUM	<i>Valley Creek</i>	<i>Museum</i>

NORTH AVONDALE LIBRARY	<i>Village Creek</i>	<i>Library</i>
NORTH BHM PARK AND RECREATION CENTER	<i>Village Creek</i>	<i>Park and Rec Center</i>
NORWOOD COMMUNITY CENTER	<i>Village Creek</i>	<i>Rec Center</i>
NORWOOD POOL	<i>Village Creek</i>	<i>Pool</i>
PRATT CITY LIBRARY	<i>Village Creek</i>	<i>Library</i>
REGIONS FIELD	<i>Valley Creek</i>	<i>Baseball Field</i>
SHIELD CENTER	<i>Village Creek</i>	
SIGN AND PAINT BLDG	<i>Valley Creek</i>	
SLOSS MUSEUM SITE	<i>Valley Creek</i>	<i>Museum</i>
SLOSS MUSEUM SITE (NEW)	<i>Valley Creek</i>	<i>Museum</i>
SMITHFIELD LIBRARY	<i>Five Mile Creek</i>	<i>Library</i>
SWANK BLDG	<i>Valley Creek</i>	
TITUSVILLE LIBRARY	<i>Valley Creek</i>	<i>Library</i>
TRUCK SHOP	<i>Valley Creek</i>	
UNDERWOOD POOL	<i>Valley Creek</i>	<i>Pool</i>



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## **POLLUTION PREVENTION/GOOD HOUSEKEEPING PROGRAM SUMMARY**

In accordance with the City's National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit, issued on March 1, 2018, the City shall further develop or revise, implement, and maintain a program that will prevent or reduce the discharge of pollutants in storm water run-off from municipal operations to the MEP. The program shall include at a minimum, the following elements:

- ✓ Inventory all municipal facilities having the potential to discharge pollutants via stormwater runoff
- ✓ Develop and implement a short and long-term strategy and program for the removal of trash from the waterways and tributaries in the permitted area in such a manner to quantify the removal of trash per year, which shall be included in the annual report and SWMPP
- ✓ Require certain measures to be implemented in the public ROW for any event or wherever it is anticipated that substantial quantities of trash or litter may be generated
- ✓ Ensure that trash receptacles or similar trash capturing devices are provided and maintained in areas identified as high trash generated areas
- ✓ Provide standard operating procedures detailing good housekeeping practices to be employed at appropriate municipal facilities and during municipal operations that may include, but not limited to:
  - Equipment washing
  - Street sweeping
  - Municipal road maintenance
  - Chemical and waste storage and disposal
  - Vegetation control, cutting, removal, and disposal
  - Vehicle fleet/equipment maintenance and repair
  - External building maintenance
  - Materials storage facilities and yards
- ✓ Program for inspecting municipal facilities to include municipal maintenance shops and equipment yards for good housekeeping practices, including BMPs. The program shall include checklists and procedures for correcting deficiencies
- ✓ A training program for municipality staff in good housekeeping practices
- ✓ Assess water quality impacts for those flood management projects owned, operated or the responsibility of the City. Feasibility of retro-fitting existing structural control devised to provide additional pollutant removal from the stormwater shall be evaluated.

### ***MUNICIPAL FACILITIES:***

The City of Birmingham provides a wide range of services to its citizens by various City Departments and facilities located throughout the City. The City maintains approximately 125 facilities that consists of parks, ball fields and building grounds. A list of the facilities has been mentioned above including the watershed the facility fall into and the type of facility.

### ***STANDARD OPERATING PROCEDURES AND SCHEDULE FOR REPLACEMENT AS NEEDED:***

The City of Birmingham has developed Standard Operating Procedures (SOPs) for various activities requires for implementing Pollution Prevention and Good Housekeeping Program. Sops may include but not limited to the following:

- Equipment washing
- Street sweeping
- Maintenance of municipal roads owned, operated, or under the responsibility of the Permittee
- Storage and disposal of chemicals and waste materials
- Vegetation control, cutting, removal, and disposal of cuttings
- Vehicle fleets/equipment maintenance and repair
- External Building maintenance
- Materials storage facilities and storage yards

***FACILITY INSPECTION PLAN AND PROCEDURE:***

- a) Qualified personnel shall conduct periodic routine facility inspections to determine the effectiveness of the Pollution Prevention Measures and Controls.
- b) All City facilities inspections will be performed at least once throughout a permit cycle, if deficiencies are observed additional inspections may be performed.
- c) Municipal facilities that include maintenance shops, equipment yards, and/or storage facilities will be inspected annually for good housekeeping practices including BMPs
- d) The inspector shall document the findings of each routine facility inspections performed and the facility should be informed via verbal and/or electronic communication about any deficiencies.
- e) The inspections must be documented through the use of a checklist that is developed to include each of the controls and measures that are evaluated.
- f) When deficiencies are noted the operator of the facility will be notified, a case opened and followed-up correspondence until corrected

***TRAINING PROGRAM ELEMENT:***

The City of Birmingham Stormwater Management Program has developed a Quarterly Leadership Meeting with City staff that work with stormwater related issues, such as Department of Public Work, Park and Recreation, and Fire. The purpose of the meetings is to discuss recent or ongoing stormwater issues and collectively coming up with ideas to resolve stormwater issues and tailor them to fit each facility, department, or operation. Training is performed four times a year and may include discussions of the following topics:

- Stormwater Management Plan (SWMP)
- Structural Controls
- Good Housekeeping and Spill Prevention
- Spill Control and Response
- Equipment washing
- Street sweeping
- Maintenance of municipal roads owned, operated, or under the responsibility of the Permittee
- Storage and disposal of chemicals and waste materials
- Vegetation control, cutting, removal, and disposal of cuttings
- Vehicle fleets/equipment maintenance and repair
- External Building maintenance





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- Materials storage facilities and storage yards

As part of the training program, City staff will review existing SOPs and are informed about any changes or updates to the SOPs. By participating in the training, City staff acknowledges that they have read and will implement SOPs.

A sign-in sheet shall be used to document City employees that have received training.

### ***TRASH REMOVAL:***

#### ***RECYCLING***

Recycling has become the most attractive method of waste reduction. This is attributed to the following factors associated with recycling. It conserves energy and natural resources, extends sanitary landfill life, and promotes total involvement of citizens and closes the recycling loop through buying recycled products.

In addition to current recycling activities, the City has designed and implemented a recycling program. The program's objective is to reduce material disposed in our sanitary landfills by 25%.

The City collects recyclables curbside once a week on Wednesdays with our own trucks. Then transported to a centrally located recyclable processor.

Our curbside program involves the following activities:

- Weekly collection of recyclables on Wednesday:
- Participation is voluntary
- The materials are not sorted curbside since the processor accepts commingled recyclables and
- The program is periodically advertised and promoted.

Curbside recycling requires preparation of materials and convenient collection methods. In our curbside program, citizens are asked to prepare materials at home and place it on the curb in recycle bins provided by the City of brown paper bags. In addition to curbside recycling the City operates:

- An in-house office paper recycling program for all City Departments and agencies;
- A metal recycling program at Eastern Area Landfill; and
- A wood chipping program at New Georgia Landfill.

Composting yard waste is a major aspect of the City's recycling programs. Brush leaves, tree clippings and yard material can be composed into mulch and top soil substitutes. Composted products can be used as landfill cover material and for decorative purposes by the Park and Recreation Board or Botanical Gardens. The City will accept private proposals for composting.

Materials recycled by the City are yard waste, paper, cardboard, aluminum cans, and steel/tin cans, and plastics (#1 and #2). Eastern Area Landfill anything that is mostly metal is acceptable. All of these recyclables, except yard waste, are delivered to recycling processors.

The benefits of recycling is a reduction in the volume of waste sent to the landfills making them last longer, additional revenue to the City, and it saves natural resources since most of the material is used again to produce new products.

### *STREET SWEEPING*

The City of Birmingham Street Sweeping Program runs year-round to provide safe conditions for all modes of transportation by removing debris and other material from the roadways and bike lanes. Sweeping also protects air and water quality and prevents debris from entering storm drains which complies with state and federal storm water quality requirements. The programs consist of 15 Routes the goal is to sweep residential streets four times per year, main arterials daily, and as needed for special events. Residential routes and scheduling have been designed not to interfere with trash collection. The following factors frequently influence our street cleaning efforts:

- Weather: rainfall, snow, wind, and ice
- Equipment breakdowns
- Utility work by outside agencies
- Private construction activities
- Overhanging tree limbs that prohibit sweeper access to curb or street
- Heavy leaf fall

Citizens can help the street sweepers do their job by removing vehicles, trash cans, and other obstructions from the street. It is also helpful to keep tree branches and bushes trimmed back so sweepers can sweep up to the curb line.

It is unlawful for waste of any kind or nature whatsoever to be thrown or swept into any street, sidewalk, gutter, sewer, intake, alley, vacant lot, or open space area. Residents, business owners, and landscape companies can help out by not blowing grass clippings or disposing yard waste, leaves, and branches into the street for a sweeper to clean up. Residents and business owners are responsible for sidewalks adjacent to their property within the public right-of-way.

### *CITY CLEANUPS*

The City of Birmingham partners and participates in several in and out of stream cleanups annually. These cleanups are volunteer driven to increase environmental stewardship throughout the community. The cleanups have removed tons of litter and educated hundreds of citizens.

### ***TRASH PREVENTION:***

#### *DO NOT LITTER SIGNS*

In an effort to prevent trash in the City, Stormwater Management and Keep Birmingham Beautiful Commission has partnered together to place “Do Not Litter” signs. The signs also specify the watershed based on the signs location. So far there has been 19 signs placed throughout the City.

### *ENFORCEMENT OF ILLEGAL DUMPING*



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Section 4-3-9 of the Birmingham City Code of Ordinances requires that, “(a) It shall be unlawful for any person to dispose of garbage or refuse anywhere other than in approved garbage or rubbish containers for city or other pickup as provided herein, in special garbage and rubbish containers provided for use of the premises as provided herein or in disposal areas authorized by federal or state law and city ordinance and permitted by the state department of environmental management. Also, it shall be unlawful for any person to dispose of garbage or refuse on property not their own without permission of such property owner, occupant or agent, provided that any such disposal shall be in authorized disposal areas as provided in subsection (a) of this section.”

Section 4-5-5 of the Birmingham City Code of Ordinances requires that, “No person hauling earth, trash, slag, concrete, gravel, coke, coal or other substance in any vehicle along or over any of the streets of the city shall allow that earth, trash, slag, concrete, gravel or other substance to escape from any vehicle and be deposited upon any of the streets.”

Code Enforcement is responsible for responding to complaints regarding but not limited to possible violations of illegal dumping.

#### *UAB STENCILING*

The University of Alabama at Birmingham (UAB) Department of Occupational Health and Safety (OH&S) and the City of Birmingham Stormwater Management have collaborated on a project to label stormwater drains on the UAB Academic and Medical Campuses. The project aims to protect the receiving water bodies from pollution and to elevate environmental compliance and awareness at UAB. The stormwater drain inlets are to be labeled with markers that discourage the public from illegally dumping chemicals and trash into stormwater drains.

#### ***EVENT TRASH COLLECTION:***

For City-managed event, trash receptacles and trash collection services will be provided by the Departments of Public Works, Parks and Recreation, or a contracted vendor.

**MAJOR ACCOMPLISHMENTS:** This year we began inspecting municipal facilities owned by the City of Birmingham. As stated in the Structural Control section, by providing annual inspections on all structural controls at City of Birmingham facilities has allowed for another layer of oversight at facilities that are sometimes the responsibilities of more than one City Department. This oversight helps to foster communication between Departments and allows the City to coordinate and utilize resources to better maintain these control structures. Inspections allow the City of Birmingham to better meet Permit conditions related to the MS4 and stormwater management.

**FUTURE DIRECTION:** The Stormwater Management Division will continue implement and maintain a program that will reduce the discharge of pollutants into the City MS4.

